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10 *Plaintiffs' Interim Co-Lead Class Counsel*

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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14
15 JOHN PRUTSMAN, AMIRA MARTZ,
16 SIMCHA RINGEL, NAIOMI MARDEN,
ALANA BALAGOT, CORINNE
17 WARREN, SUNNY LAI, AND DAVID
KLEIN, INDIVIDUALLY AND ON
18 BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

19 PLAINTIFFS,
20 VS.

21 NONSTOP ADMINISTRATION AND
INSURANCE SERVICES, INC.,
22 INCLUSIVE,

23 DEFENDANT.

CASE NO. 3:23-CV-01131-RFL

**STIPULATION RE: PROPOSED SECOND
EXTENSION OF TIME TO FILE MOTION
FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT; ~~PROPOSED~~
ORDER**

Judge: Hon. Rita F. Lin

1 Plaintiffs John Prutsman, Amira Martz, Simcha Ringel, Naiomi Marden, Alana Balagot,
 2 Corrine Warren Sunny Lai, and David Klein, (hereinafter “Plaintiffs”), and Defendant Nonstop
 3 Administration and Insurance Services, Inc., (hereinafter “Defendant” or “Nonstop”), collectively
 4 referred to as “the Parties”, hereby stipulate, subject to the Court’s agreement, to extend the
 5 deadline for Plaintiffs to file their Motion for Preliminary Approval of Class Action Settlement,
 6 and in support thereof state as follows:

7 WHEREAS, on June 6, 2024, the Parties conducted a full-day mediation before the well-
 8 respected mediator Bennet G. Picker of Stradley Ronan and after extensive negotiations,
 9 eventually reached a class wide settlement in principle;

10 WHEREAS, on June 27, 2024 the Parties filed a Joint Case Management Statement and
 11 Notice of Settlement and requested forty-five (45) days for Plaintiffs to file their Motion for
 12 Preliminary Approval (ECF No. 92) and on July 1, 2024 the Court vacated the Case Management
 13 Conference set for July 3, 2024 and further ordered that the deadline for Plaintiffs to file their
 14 Motion and a status update regarding the third-party claims against Conor Fitzpatrick be set for
 15 August 12, 2024 (ECF No. 93);

16 WHEREAS, the Parties have been mutually working together to finalize the settlement
 17 agreement and accompanying papers, and to select a settlement administrator to oversee the notice
 18 and claims procedure;

19 WHEREAS, the Parties requested and the Court granted a fourteen (14) day extension of
 20 time to finalize the agreement and for Plaintiffs’ to draft their Motion for Preliminary Approval
 21 once the agreement has been finalized and the settlement administrator selected (ECF Nos. 95-
 22 96); and

23 WHEREAS, since that time the Parties have selected a settlement administrator and
 24 finalized the settlement and motion for preliminary approval and are in the process of having the
 25 settlement agreement executed by Plaintiffs and are now requesting a second extension of time to
 26 fully execute the settlement agreement, subject to Court approval;

27 NOW THEREFORE, subject to the Court’s approval and Order, it is stipulated by and
 28 between the parties, through their respective counsel of record, that Plaintiffs’ deadline to file their

1 Motion for Preliminary Approval be enlarged by an additional fourteen (14) days or until
2 September 13, 2024.

3 **IT IS SO STIPULATED.**

4 Dated: August 26, 2024

COLE & VAN NOTE

6 By: /s/ Scott Edward Cole
7 Scott Edward Cole, Esq.

8 Dated: August 26, 2024

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

10 By: /s/ Gary M. Klinger
11 Gary M. Klinger, Esq.

12 *Plaintiffs' Interim Co-Lead Class Counsel*

13 Dated: August 26, 2024

CIPRIANI & WERNER PC

14 By: /s/ Jill H. Fertel
15 Jill H. Fertel, Esq.

16
17 *Counsel for Defendant*

ORDER

THE PARTIES HAVING STIPULATED, AND GOOD CAUSE APPEARING, the Court hereby enters its Order extending Plaintiffs' deadline to file their Motion for Preliminary Approval and the deadline for the Parties to file a status update regarding the third-party claims against Conor Fitzpatrick be enlarged by fourteen (14) days, or on or before September 13, 2024.

IT IS SO ORDERED.

Dated: August 27, 2024



Hon. Rita F. Lin
United States District Court for the Northern
District of California